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July 26, 2023

Via ECF

The Honorable Vera M. Scanlon
United States Magistrate Judge
U.S. District Court, Eastern District of New York
Brooklyn, New York 11201

Re: *Henkin, et al. v. Qatar Charity, et al.*, 21-cv-05716-AMD-VMS

Dear Judge Scanlon:

I write pursuant to Your Honor's Individual Practice Rule II.b to request a 60-day extension of the July 31, 2023 deadline for conducting jurisdictional discovery. *See* ECF 81 at 29. There has been no prior request to extend this deadline.

In a July 20, 2023 letter to Your Honor, counsel for Defendants erroneously advised that the parties would request a 7-day extension of the July 31, 2023 cut-off *from Judge Donnelly* "as it would require a modification of Judge Donnelly's order." ECF 109. Plaintiffs believe Your Honor has full authority to extend the discovery cut-off, pursuant to Judge Donnelly's March 31, 2023 order (which assigned to Your Honor "manage[ment of] the jurisdictional discovery and set[ting] a briefing schedule for any additional dispositive motions") and Local Civil Rule 72.2 (which provides that an assigned Magistrate Judge "is empowered to act with respect to all non-dispositive pretrial matters unless the assigned District Judge orders otherwise").

Defendants consent to only a 7-day extension of the July 31 cut-off date. Defendants counsel have not indicated whether they intend to respond to, or oppose, this motion.

Plaintiffs request a 60-day extension because a total of 53 days of the 120-day discovery period were consumed by Defendants' motions for protective orders: from the date of the discovery status conference on May 16, 2023 until July 8, 2023 when Your Honor's ruling issued. Defendants have not yet produced any of the documents Your Honor ordered them to produce on or before July 20, 2023. *See* ECF 106 at 8. Plaintiffs therefore will need the additional time to adequately review the documents to determine whether any further motion practice is warranted and whether it will be necessary to seek the Court's permission to subpoena Defendant Masraf al Rayan's New York correspondent banks. Counsel for Masraf has also indicated that at least some of the documents that will be produced may be written in Arabic. Plaintiffs will also need time to obtain the necessary translations of these documents.

The requested 60-day extension will not affect any other scheduled dates in the case. Wherefore, Plaintiffs respectfully request that the deadline for completion of discovery be extended to and including September 29, 2023.

Respectfully submitted,

/s/ Patrick L. Rocco